



**SOUTHWEST SHIPYARD, L.P.**

18310 Market Street  
Channelview, TX 77530

Located in the Houston area at the intersection  
of I-10 East and the San Jacinto River

Repair - Cleaning - Gas Freeing - Steaming - Conversions - New Construction

Phone - 281/860-3200 Fax 281/860-3215

February 11, 1998

INFORMATION COPY

RECEIVED

FEB 12 1998

REGION 12

Mr. John L. Sadlier  
Enforcement Division, Multi-Media Section, MC-219  
Texas Natural Resource Conservation Commission  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: a. **Southwest Shipyard, L.P.**  
**Docket No. 97-0453-IHW-E**  
**Agreed Order, Ordering Provision 2i**

b. **Workplan for Site Assessment of Portions of A, B, and C Yards, prepared by Groundwater Services, Inc. on behalf of Southwest Shipyard, L.P., submitted to TNRCC, October 27, 1997**

c. **Closure and Remediation Letter from Southwest Shipyard, L.P. to TNRCC, January 8, 1998**

d. **Correspondence from Mr. David L. Davis, TNRCC to Mr. John Hilliard, Southwest Shipyard, L.P., TNRCC Review, January 28, 1998**

Dear Mr. Sadlier:

In accordance with our discussion on January 30, 1998, and in accordance with Provision 2w of the Agreed Order, and on behalf of Southwest Shipyard, L.P., I am submitting the following response to the concerns expressed in reference d.

**Basis for Workplan**

The Workplan for Site Assessment of Portions of A, B, and C Yards, reference b, was submitted per provision 2i of the Agreed Order, reference a, that required assessment of potential surficial soil impacts from spent sandblast grit, paint wastes, and insulating materials associated with past site operations in these areas. The workplan addressed the four areas of concern noted by the TNRCC during a December 1996 site visit, as follows: i) the Dry dock Rail Area, A yard, ii) the Roll-off Bin Storage Area, A Yard, iii) the Sheet Metal Dock Area, B Yard, and iv) the Barge Painting Area, C Yard.

At each of these four areas, removal of waste debris has previously been completed by Southwest Shipyard, L.P. in response to the comments received from the TNRCC in December 1996. Consequently, the proposed Workplan, reference b, outlines field, laboratory and engineering tasks to confirm the remedial measures undertaken to date have been sufficient to address potential soil impacts.

Results obtained during the site investigation will be reviewed per requirements of the Texas Risk Reduction Rules set forth in 30 TAC 335 Subchapter S. If concentrations of constituents of concern exceed applicable regulatory limits in surficial soils at these sites, further soil and/or groundwater investigations and other appropriate actions will be taken in accordance with requirements of the Agreed Order and applicable regulations. Furthermore, please note that the TNRCC concerns regarding the former surface impoundment on the Southwest Shipyard, L.P. property are being addressed under a separate work program and the proposed Workplan for Site Assessment of Portions of A, B, and C Yards, reference b, is submitted only in response to Provision 2i of the Agreed Order, reference a.

### **Proposed Workplan and Implementation Schedule**

The Workplan issued October 27, 1997, has been reviewed in consideration of the TNRCC letter of January 29, 1998, reference d. A review of proposed work tasks and appropriate modifications in response to TNRCC concerns is provided in Table 1.

The TNRCC has suggested that field investigations for the Sheet Metal Dock Area on B Yard commence within 7 days of the comment letter issued January 29, 1998. However, entry to B Yard has been delayed pending completion of a site access agreement between the property owner and Southwest Shipyard, L.P. In addition, Southwest would like to confirm that the TNRCC agrees with the revised Workplan provisions summarized in Table 1 prior to project start-up. Therefore, Southwest proposes to begin field work within 2 weeks of approval from the TNRCC of the Workplan, subject to the consent of the property owners.

Current plans call for completion of the work program described in the Workplan issued October 27, 1997, reference b, and the revisions summarized in Table 1 within 120 days following TNRCC approval of the Workplan, reference b. If results of the field program indicate that additional investigations or remedial actions are necessary, the final report will include a preliminary evaluation of required supplemental work tasks and preliminary schedule for completion.

Please contact me with any comments or requests for additional information at 281-860-3200.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Jones', with a stylized flourish at the end.

Lynn R. Jones  
Environmental Manager

cc:

Leonard Spearman, TNRCC-Houston Regional Office  
Mr. David L. Davis, TNRCC-Austin  
Ms. Sue Rogers, TNRCC-Austin

Enclosure:

**Table 1, Response to TNRCC Comments Issued January 29, 1998**

**TABLE 1**  
**RESPONSE TO TNRCC COMMENTS ISSUED JANUARY 29, 1998**

**Workplan for Site Assessment of Portions of A, B, and C Yards**

Former Surface Impoundment  
 Southwest Shipyard, Channelview, Texas

AREA OF CONCERN	TNRCC COMMENT SUMMARY	SOUTHWEST SHIPYARD RESPONSE
Roll-off Bin Storage Area(A Yard)	1. Note that the Roll-off Bin Storage Area is in the southwest section of A Yard.	• Agreed.
	2. Provide an arrow showing true north as well as plant north on each map submitted to the TNRCC.	• Future submittals to the TNRCC will include an arrow indicating true north.
	3. Verify that tank bottoms from the Roll-off Bin Storage Area were sampled on 12/10/96.	• That is correct.
	4. In order to approve Southwest Shipyard's proposal for no further sampling in this area, please provide historical information regarding site investigations for this area. Include analytical results and geological cross-sections from soil borings SB-1, SB-5, UTZ-2, UTZ-3, and RA-1.	<ul style="list-style-type: none"> <li>• The BLRA for the former surface impoundment submitted to the TNRCC provides a summary of previous soil investigations in the vicinity of the Roll-off Bin Storage Area. The BLRA includes a cross-section near the Roll-off Bin Storage Area and available sampling data from soil borings SB-1, SB-5, UTZ-2, UTZ-3, and RA-1.</li> <li>• Please note that corrective measures for the former surface impoundment are being addressed in a separate work program and are not within the scope of this specific workplan.</li> </ul>
Barge Painting Area (C Yard)	1. Southwest Shipyard has proposed no remedial actions for this area owing to ongoing dredging activities by the owner of C Yard which may have resulted in i) site disturbance and ii) potential removal of residual materials. TNRCC staff visited the site on 1/23/98 and believe that i) no disturbance has occurred in the area, ii) the site is accessible, and iii) no dredged materials are located atop the former Barge Painting Area. Therefore, an investigation should be proposed for this area to investigate soils and river sediments.	<ul style="list-style-type: none"> <li>• No further action was proposed for the Barge Painting Area, because previous remedial actions have been completed involving removal of sand blast grit, paint wastes, and insulation materials from the area. Also, observations of the site possible from a distance indicated that ongoing dredging activities may have substantially altered the site, making meaningful evaluation of site impacts difficult.</li> <li>• To verify that remedial actions have been sufficient to address potential impacts to surficial soils, samples will be collected and analyzed for constituents of concern from ten locations within the area previously used by Southwest Shipyard (i.e., SS-BP-1 through 10, see Figure 1).</li> <li>• Laboratory analyses of spent blast sand indicate that concentrations of TCLP volatile and semi-volatile organics were below relevant method detection limits and that TCLP metals concentrations were below applicable regulatory limits. Thus, releases of paint overspray and spent sandblast grit would have resulted in minimal impact to river sediments. Therefore, sediment sampling is not appropriate at this time.</li> </ul>

**Notes:**

1. Southwest Shipyard response is based on TNRCC Comments issued 1/29/98, regarding the "Workplan for Site Assessment of Portions of A, B, and C Yards, Southwest Shipyard, Channelview, Texas," issued 10/27/97.
2. BLRA = "Baseline Risk Assessment, Former Surface Impoundment, Southwest Shipyard," issued 9/26/97.
3. OVA = Organic vapor analyzer.  
 TCLP = Toxicity Characteristic Leaching Procedure.

**TABLE 1**  
**RESPONSE TO TNRCC COMMENTS ISSUED JANUARY 29, 1998**

**Workplan for Site Assessment of Portions of A, B, and C Yards**

Former Surface Impoundment  
 Southwest Shipyard, Channelview, Texas

AREA OF CONCERN	TNRCC COMMENT SUMMARY	SOUTHWEST SHIPYARD RESPONSE
Barge Painting Area (C Yard)	2. Provide a copy of the access agreement between Southwest Shipyard and the property owner of C Yard.	• Southwest Shipyard is currently working to execute an agreement for site access with the owner of C Yard. If such an agreement can be reached, a copy of the document will be provided to the TNRCC.
Dry Dock Rail Area (A Yard)	1. Clarify whether all soil samples will be submitted for laboratory analysis or only those with elevated OVA readings.	• All surface soil samples collected from locations proposed in the Workplan will be submitted for laboratory analysis of constituents of concern.
	2. In addition to volatile organic compounds and metals as proposed in the Workplan, soil samples should be analyzed for semi-volatile organic compounds.	• Wastes potentially generated at the Dry Dock Rail Area in A Yard were limited to spent blast sand, paint and rust chips, and paint overspray. Constituents of concern associated with these wastes are volatile organic compounds and metals; therefore, analysis of semi-volatile organics is not applicable to this work program.
	3. Samples should be analyzed by standard EPA methods and QA/QC data provided.	• EPA SW-846 methods will be used and Level II QA/QC data packages will be provided as part of the final report submitted to the TNRCC.
	4. If the surface soil samples collected per the Workplan indicate affected soils, then soil samples should be collected and analyzed at 2, 5, and 9 ft BGS and at the top of the saturated zone.	• Results obtained during the surficial soils investigation will be reviewed per requirements of the Texas Risk Reduction Rules (30 TAC 335 Subchapter S). If concentrations of constituents of concern exceed applicable regulatory limits in surficial soils at these sites, further soil and/or groundwater investigations and other appropriate actions will be taken in accordance with requirements of the Agreed Order and applicable regulations.
	5. A soil sample should be collected from an additional location approximately 40 ft north of proposed SS-DD-10.	• Agreed.

**Notes:**

- Southwest Shipyard response is based on TNRCC Comments issued 1/29/98, regarding the "Workplan for Site Assessment of Portions of A, B, and C Yards, Southwest Shipyard, Channelview, Texas," issued 10/27/97.
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TABLE 1  
 RESPONSE TO TNRCC COMMENTS ISSUED JANUARY 29, 1998

Workplan for Site Assessment of Portions of A, B, and C Yards

Former Surface Impoundment  
 Southwest Shipyard, Channelview, Texas

AREA OF CONCERN	TNRCC COMMENT SUMMARY	SOUTHWEST SHIPYARD RESPONSE
Sheet Metal Dock Area (B Yard)	1. Revise the site map for this area to include the following site features: i) office trailer, ii) sand blasting area, iii) two sand hoppers, iv) container storage area, v) road leading to the Sheet Metal Dock area, and vi) paint storage building.	• The site plan has been revised as requested (see Figure 2).
	2. Clarify whether all soil samples will be submitted for laboratory analysis or only those with elevated OVA readings.	• All surface soil samples collected from locations proposed in the Workplan will be submitted for laboratory analysis of constituents of concern.
	3. In addition to volatile organic compounds and metals as proposed in the Workplan, soil samples should be analyzed for semi-volatile organic compounds.	• Wastes potentially generated at the Sheet Metal Dock Area were limited to spent blast sand, paint and rust chips, and paint drip and overspray. Constituents of concern associated with these wastes are volatile organics and metals; therefore, analysis of semi-volatile organics is not applicable to this work program.
	4. Samples should be analyzed by standard EPA methods and QA/QC data provided.	• EPA SW-846 methods will be used and Level II QA/QC data packages will be provided as part of the final report submitted to the TNRCC.
	5. If the surface soil samples collected per the Workplan indicate affected soils, then collect and analyze soil samples at 2, 5, and 9 ft BGS and at the top of the saturated zone.	• Results obtained during the surficial soils investigation will be reviewed per requirements of the Texas Risk Reduction Rules (30 TAC 335 Subchapter 5). If concentrations of constituents of concern exceed applicable regulatory limits in surficial soils at these sites, further soil and/or groundwater investigations and other appropriate actions will be taken in accordance with requirements of the Agreed Order and applicable regulations.
	6. Provide a copy of the access agreement between Southwest Shipyard and the property owner of B Yard.	• Southwest Shipyard is currently working to execute an agreement for site access with the owner of B Yard. If such an agreement can be reached, a copy of the document will be provided to the TNRCC.
	7. Additional soil borings (SS-SM-9 and 10) are requested contingent upon an access agreement between Southwest Shipyard and the property owner of B Yard.	• Southwest Shipyard seeks clarification regarding whether additional soil borings are requested.

Notes:

1. Southwest Shipyard response is based on TNRCC Comments issued 1/29/98, regarding the "Workplan for Site Assessment of Portions of A, B, and C Yards, Southwest Shipyard, Channelview, Texas," issued 10/27/97.
2. BLRA = "Baseline Risk Assessment, Former Surface Impoundment, Southwest Shipyard," issued 9/26/97.
3. OVA = Organic vapor analyzer.  
 TCLP = Toxicity Characteristic Leaching Procedure.

**TABLE 1**  
**RESPONSE TO TNRCC COMMENTS ISSUED JANUARY 29, 1998**

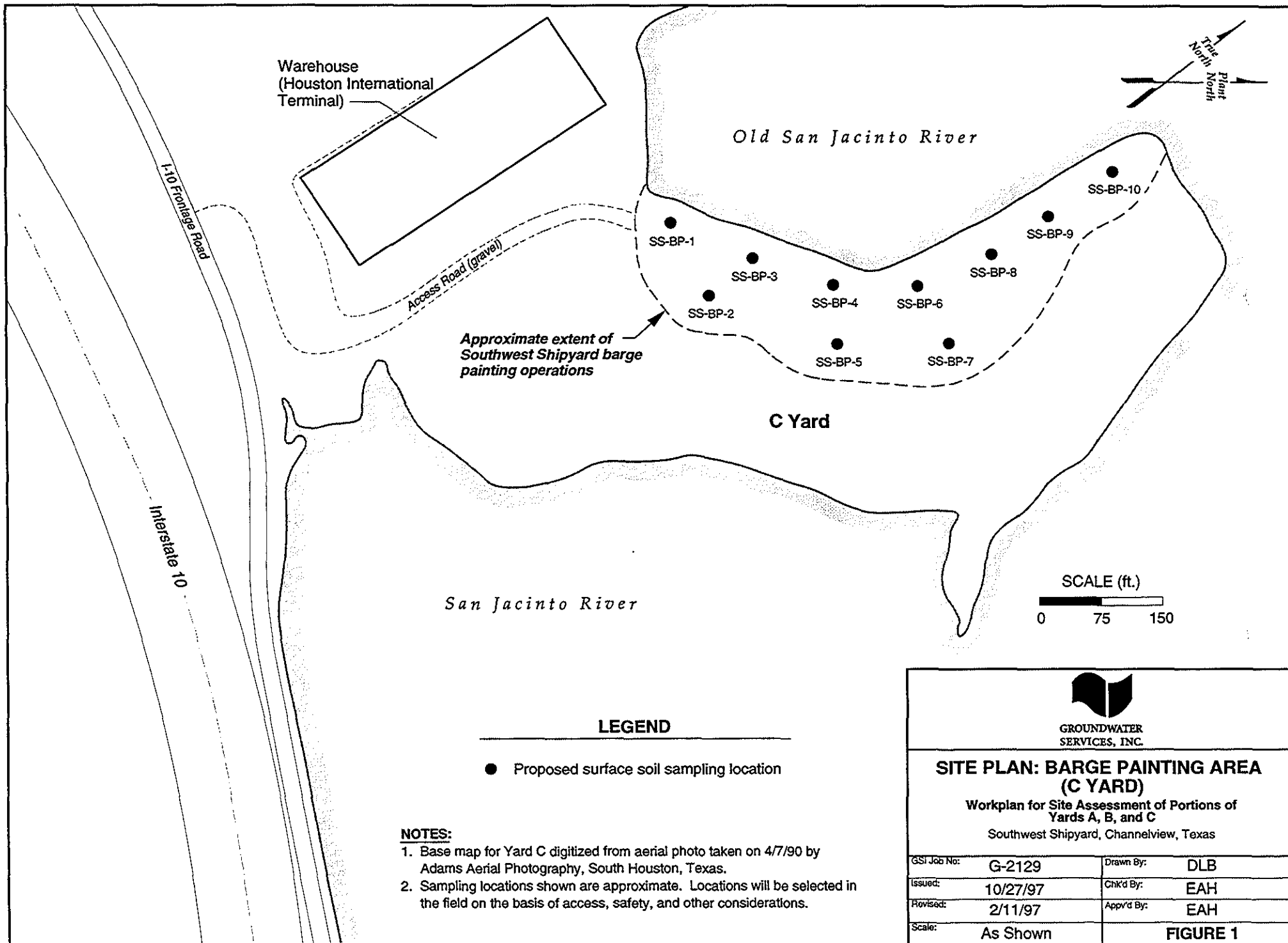
**Workplan for Site Assessment of Portions of A, B, and C Yards**

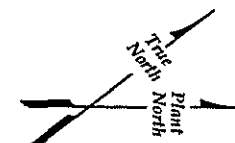
Former Surface Impoundment  
 Southwest Shipyard, Channelview, Texas

AREA OF CONCERN	TNRCC COMMENT SUMMARY	SOUTHWEST SHIPYARD RESPONSE
Background Metals (A Yard)	1. TNRCC understands that a municipal landfill was previously operated in the area of proposed background soil samples. A different location should be proposed for collection of soil samples used to evaluate background metals concentrations.	• Aerial photographs taken at approximate 5-yr intervals from 1965 to 1996 evidenced no apparent activities associated with a municipal landfill. However, nearly all of the peninsula on which Southwest Shipyard is located has been filled using dredged materials. Fill activities appear to have been minimal in an area immediately adjacent to the entrance road (i.e., north of the previously proposed background locations). Therefore, alternate background soil sampling locations are proposed in this area (see Figure 3).

**Notes:**

1. Southwest Shipyard response is based on TNRCC Comments issued 1/29/98, regarding the "Workplan for Site Assessment of Portions of A, B, and C Yards, Southwest Shipyard, Channelview, Texas," issued 10/27/97.
2. BLRA = "Baseline Risk Assessment, Former Surface Impoundment, Southwest Shipyard," issued 9/26/97.
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Old San Jacinto River

Existing high bank

SHEET METAL DOCK

Paint Mixing Area

Office Trailer above Paint Storage Building

Container Storage Area

Sand Hopper No. 2

Sand Hopper No. 3

SHEET METAL DOCK

SS-SM-1

SS-SM-2

SS-SM-3

SS-SM-4

SS-SM-5

SS-SM-6

SS-SM-7

SS-SM-10

SS-SM-8

SS-SM-9

Approximate Extent of Former Sand Blasting Area

SCALE (ft.)

0 25 50

Private Road

# LEGEND

- Proposed surface soil sampling location

**Note:** Sampling locations shown are approximate. Locations will be selected in the field on the basis of access, safety, and other considerations.



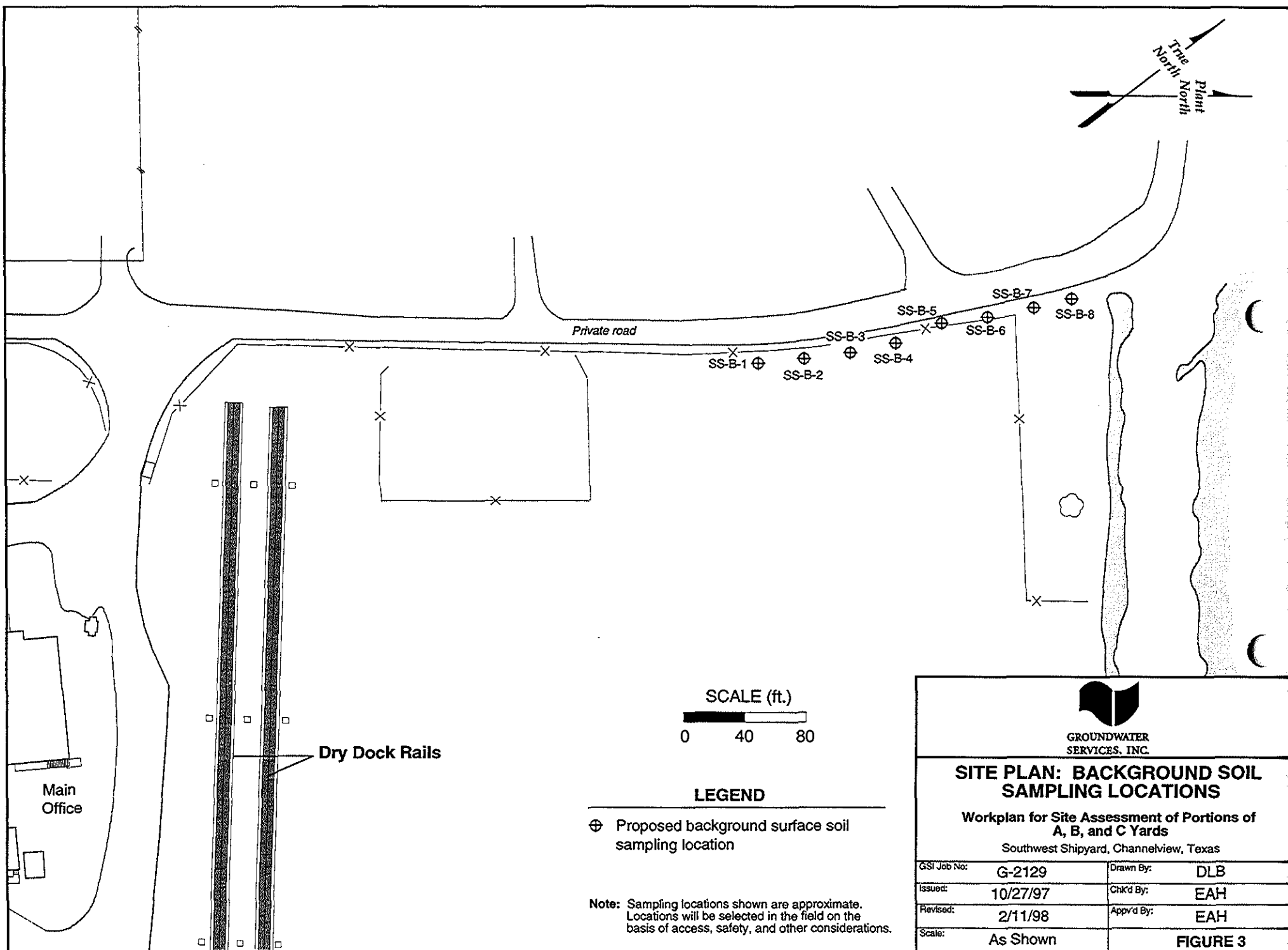
GROUNDWATER SERVICES, INC.

## SITE PLAN: SHEET METAL DOCK AREA (B YARD)

Workplan for Site Assessment of Portions of A, B, and C Yards

Southwest Shipyard, Channelview, Texas

GSI Job No:	G-2129	Drawn By:	DLB
Issued:	10/27/97	Chk'd By:	EAH
Revised:	2/11/98	App'd By:	EAH
Scale:	As Shown	FIGURE 2	



GROUNDWATER  
SERVICES, INC.

### SITE PLAN: BACKGROUND SOIL SAMPLING LOCATIONS

Workplan for Site Assessment of Portions of  
A, B, and C Yards

Southwest Shipyard, Channelview, Texas

GSI Job No:	G-2129	Drawn By:	DLB
Issued:	10/27/97	Chk'd By:	EAH
Revised:	2/11/98	App'd By:	EAH
Scale:	As Shown		FIGURE 3